February 23, 2018

VIA ECF

Honorable Katharine H. Parker United States Magistrate Judge Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street, Room 1950 New York, NY 10007

Re: <u>Patriarch Partners Agency Servs., LLC v. Zohar CDO 2003-1, Ltd. et al., No. 16 Civ.</u> 4488 (VM)(KHP)

Dear Judge Parker:

Pursuant to Your Honor's instructions at the February 13, 2018 conference, we write on behalf of the parties to provide an update regarding the status of negotiations as to scheduling and PPAS's discovery requests.

The parties are continuing to confer regarding a deadline for document discovery and will provide the Court with an update next week. The parties also are conferring regarding search terms for PPAS's recent discovery requests.

Respectfully submitted,

LLC

GIBSON DUNN & CRUTCHER LLP

QUINN EMANUEL URQUHART & SULLIVAN LLP

By: /s/ Lawrence J. Zweifach

Lawrence J. Zweifach Laura K. O'Boyle 200 Park Avenue New York, New York 10010 Tel.: 212-351-4000

Attorneys for Patriarch Partners Agency Services,

By: <u>/s/ Jonathan E. Pickhardt</u>

Jonathan E. Pickhardt Ellison Ward Merkel 51 Madison Avenue, 22nd Floor New York, New York, 10010 Tel.: 212-849-7000

Attorneys for Zohar CDO 2003-I, Ltd., Zohar CDO 2003-1, LLC, Zohar II 2005-1, Ltd., Zohar II 2005-1, LLC, Zohar III, Ltd., Zohar III, LLC and Alvarez & Marsal Zohar Management, LLC